

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ROBERT N. HARRINGTON, JR.)	CASE NUMBER 05-40115 FDS
Plaintiff,)	
)	
VS.)	
)	
JAMES M KREIDLER, JR. AND)	
THE TOWN OF WINCHESTER,)	
Defendants.)	

**JOINT MOTION TO EXTEND DEADLINE TO FILE PRE-TRIAL
MEMORANDUM**

All parties respectfully move the Court to extend the deadline for the parties to file their Joint Pre-Trial Memorandum from February 22, 2008 until February 26, 2008. As ground therefor, the defendants and plaintiff state as follows:

1. This action arises out of the plaintiff's employment as Police Chief of the Town of Winchendon.
2. Discovery in this case has been completed. During discovery, a large number of documents were exchanged and there were numerous days of depositions.
3. The pre-trial conference in this case is scheduled for February 28, 2008 at 2:00 p.m..
4. Due to school vacation this week and scheduling conflicts associated therewith, the undersigned counsel need additional time to prepare and file the

pre-trial memorandum; therefore, the parties are requesting until February 26, 2008 to file their Joint Pre-Trial Memorandum.

5. This request is made in good faith and is not advanced frivolously or to needlessly delay the resolution of this matter.

WHEREFORE, the parties respectfully request that this Honorable Court extend the deadline to file their joint pre-trial memorandum from February 22, 2008 until February 26, 2009

Respectfully Submitted,

The plaintiff,
By his attorney,

/s/ L. Richard LeClair, III
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The defendants,
By their attorneys,

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Date: February 21, 2008